THE STATE OF WYOMING

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GOVERNOR

Department of Environmental Quality

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ABANDONED MINES (307) 332-5085	AIR QUALITY (307) 332-6755	LAND QUALITY (307) 332-3047	SOLID & HAZARDOUS WASTE (307) 332-6924	WATER QUALITY (307) 332-3144

August 17, 2001

Richard L. Casey, Vice President
Solvay Minerals
PO Box 1167
Green River, WY 82935

RE: Solvay Minerals Green River Soda Ash Plant
Transmittal Letter

Dear Mr. Casey:

Please find enclosed with this letter, a copy of the Annual Inspection Report which Carl Disel wrote based on his inspection of the facility in July of this year. If you find errors of substance in this report, please notify me of any concerns at your earliest convenience. I would like to call your attention to the "AIR QUALITY CONCERNS" section of the report (page 2). These concerns are highlighted here for convenience.

1. D CALCINER AND DRYER OPACITY: As noted in the General Inspection Observations and Commentary section of this inspection report, the new "D" Ore Calciner, and the new DR-6 Product Dryer stacks were observed to be emitting blue-white smoke with opacities of approximately 10% and 5% respectively. Past observations of the "A" & "B" Calciner stack and the "C" Calciner stack showed very little blue-white smoke. Since Solvay has traditionally shown excellent visible emissions over the years, the Division asks for an explanation on why the new calciner and the new dryer are showing these opacities.

2. MONITOR RELIABILITY: The reliability for the NOx analyzer for Boiler #2 for the first quarter 2001 was reported to be 90.7%. Solvay explained the downtime greater than 5% to be due to a drain line freezing. When the drain line froze (2/9/01), it allowed water to back up into the analyzers. The sample lines and analyzers were purged with dry instrument air, recalibrated, and put back into service. Shortly thereafter, the NOx analyzer began experiencing sample pressure problems. On 2/16/01 the sample pressure inlet valve failed. A replacement valve was rushed in; however, the vendor sent the wrong valve. The correct valve was subsequently rushed in and installed. No monitor outages have been experienced since the 2/24/01 installation of the new pressure valve. To prevent future drain line freeze-ups Solvay

has modified the drain system to drain inside the plant during the cold winter months and an extra pressure inlet valve has been put into stock. During the inspection Tim Brown showed what steps Solvay had taken and planned on taking to alleviate freeze up problems with the opacity monitors. The opacity monitors have an optical head and retroreflector with a blower assembly. To keep the blower assembly from freezing up the blower assembly has been (will be) attached to a flexible automotive exhaust pipe. The pipe is wrapped around the stack to take advantage of the stack heat. By doing this the air is warmed before it enters the stack and the problem of condensing moisture during very cold days should be eliminated. The blower assembly modification has been make on the "C" Calciner. Modification of the blower assemblies on the "A" & "B" Calciners, the Product Dryer #5, the "D" Calciner, and the Product Dryer #6 are in progress. Solvay should be commended for taking this innovative approach to this problem.

In this letter Solvay has been provided with information on air quality compliance issues and concerns facing the facility. To assure that these issues are addressed in a timely fashion, I am requesting a response to issues raised in the letter no later than September 30, 2001. If you will have difficulty meeting this deadline, please contact me to discuss the delay. Thank you for the time your staff took in providing the necessary information to complete this report. Ms. Potter's and Mr. Brown's cooperation was appreciated.

Please call me at 307-332-6755 if you have questions concerning this matter.

Sincerely,

T. Hoyt

Tony Hoyt
Air Quality Engineer
Air Quality Division